

K&L GATES

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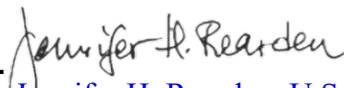
VIA ECF

Hon. Jennifer H. Rearden, U.S.D.J.
United States District Court
Southern District of New York
500 Pear Street, Room 1010
New York, NY 10007

Re: **Valley National Bank v. SLM Milledgeville, LLC, et al.**
Case No.: 1:25-cv-03824

Application GRANTED. The conference scheduled for tomorrow, May 23, 2025 at 11:00 a.m., is hereby adjourned to **June 3, 2025 at 11:00 a.m.**

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Dated: May 22, 2025

Dear Judge Rearden,

I write on behalf of Valley National Bank ("Plaintiff") in the above-captioned matter.

A hearing on the Order to Show Cause of Plaintiff's application for the appointment of a receiver is currently scheduled for tomorrow (May 23, 2025). This week, Plaintiff and Defendants SLM Milledgeville, LLC, SLM Camilla, LLC, Senior Living Properties – Milledgeville, LLC, and Senior Living Properties – Camilla, LLC (collectively "Corporate Defendants"), engaged in productive settlement discussions that may lead to a framework for the consensual resolution of this matter. As a consequence of these discussions, Plaintiff and Corporate Defendants respectfully request a 10-14 day adjournment of the hearing on the Order to Show Cause to allow these discussions to continue. Plaintiff is generally available for a rescheduled hearing during the week of June 2, 2025, and specifically proposes June 3, 2025 as a new date for such hearing. This is the first request for an adjournment.

This application is being made within two business days of the hearing date and time because it was not until yesterday afternoon (May 21, 2025) that the parties were able to have substantive discussions that led to the shared understanding that it would be productive for settlement discussions to have tomorrow's hearing briefly adjourned.

Separately, the undersigned is in receipt of this Court's order of earlier today (dkt. #17), and has notified counsel for the Corporate Defendants of same via email.

Thank you for Your Honor's attention to this matter. If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

/s/ Benjamin Rubinstein

Benjamin Rubinstein

Cc: John Page, Esq., counsel for Corporate Defendants (by e-mail)
Barry Chatz, Esq. (by ECF)